

Pamela F. Faggert
Vice President and Chief Environmental Officer

Dominion Resources Services, Inc.
5000 Dominion Boulevard, Glen Allen, Virginia 23060
Phone: 804-273-3467



By Electronic Delivery: glenn.keith@state.ma.us
April 9, 2012

Glenn Keith (glenn.keith@state.ma.us)
Department of Environmental Protection
Bureau of Waste Prevention
One Winter Street, 7th Floor
Boston, MA 02108

**Re: Comments on the Massachusetts Department of Environmental Protection's
Proposed Revisions to the Massachusetts Regional Haze State
Implementation Plan and on Proposed Amendments to 310 CMR 7.00:
Definitions and 310 CMR 7.05: Fuels All Districts**

Dear Mr. Keith:

Dominion Energy New England, Inc. ("Dominion") is pleased to respond to the Massachusetts Department of Environmental Protection's ("the Department's") request for comment on the proposed revisions to the Massachusetts Regional Haze State Implementation Plan ("SIP") and on proposed amendments to 310 CMR 7.00: Definitions and 310 CMR 7.05: Fuels All Districts¹. As you are aware, Dominion operates two electric generating facilities in the Commonwealth of Massachusetts; Dominion Energy Brayton Point, L.L.C ("Brayton Point") and Dominion Energy Salem Harbor, L.L.C. ("Salem Harbor").

We agree with the Department's proposed revisions to the Massachusetts Regional Haze SIP proposal and urge you to finalize them *as proposed* with regard to the aspects of Appendix FF: Salem Harbor – Amended Emission Control Plan Draft Approval; MassDEP, February 2012 and GG: Brayton Point – Amended Emission Control Plan Draft Approval; MassDEP, February 2012. In particular, we also support the Department's Alternative to Best Available Retrofit Technology ("BART") approach as part of the proposed revisions to the Massachusetts Regional Haze State Implementation Plan ("SIP"). The Department originally proposed to rely on the U.S. Environmental

¹ Otherwise known as the "low sulfur in fuel standards."

Protection Agency's ("EPA's") draft Transport Rule as an Alternative to BART for Electric Generating Units ("EGUs"), but could not finalize its proposal because Massachusetts was not included in EPA's final Cross-State Air Pollution Rule. The Department now proposes a different Alternative to BART for EGUs that includes the following measures:

1. Existing regulation 310 CMR 7.29, *Emissions Standards for Power Plants*, which establishes NO_x and SO₂ emissions rates (as well as mercury emission rates and carbon dioxide caps) for certain EGUs.
2. The retirement of the Somerset Power plant.
3. Permit restrictions for Brayton Point, Salem Harbor, and Mt. Tom Station that limit/retire SO₂ and/or NO_x emissions.
4. Existing regulation 310 CMR 7.19, *Reasonably Available Control Technology (RACT) for Sources of Oxides of Nitrogen NO_x*, which establishes NO_x emission rates for various sources, including EGUs.
5. MassDEP's proposed amendments to its low sulfur fuel oil regulation, which would require EGUs that burn residual oil to limit the sulfur content to 0.5% by weight beginning July 1, 2014, with the provision that existing fuel stock can be utilized.

This Proposed Revision to the Massachusetts Regional Haze SIP also addresses BART for PM₁₀. However, MassDEP has determined that no additional controls are warranted for primary PM₁₀ because controls have been added to all but one of the (non-Dominion) facilities, and the additional cost of further control is not justified since there would be no significant visibility improvement.

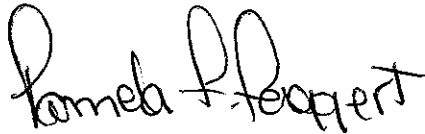
As set forth in 40 CFR 51.308(e)(2), Massachusetts may choose to implement or require participation by BART sources in an emissions trading program or an *alternative measure* that will achieve greater reasonable progress than BART implementation at all sources subject to BART. A state can establish a BART benchmark (i.e., emissions reductions that would result from the application of source-specific BART), and then can compare the emissions reductions achieved from the alternative measure with the emissions reductions that would be achieved from the BART benchmark. If the reductions from the alternative measure are greater than the BART benchmark, the state can assume that the alternative measure results in greater reasonable progress than BART. Therefore, based on the provisions of 40 CFR 51.308(e)(2), we agree that Massachusetts has the authority to implement the proposed Alternative to BART. Furthermore, as shown in section 8.10 of the proposed revised Regional Haze SIP, the Department has demonstrated its alternative to BART will achieve greater emission reductions of SO₂ and NO_x than would be achieved through the installation and operation of BART alone.

With regard to the low sulfur in fuel standards amendments, we strongly support the proposed provision of 310 CMR 7.05(1)(b)2. which provides for a fossil fuel utilization facility to be able to burn any existing stock of fossil fuel oil at the facility.

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Once again, we appreciate the opportunity to comment on the proposed revisions to the Massachusetts Regional Haze SIP and on proposed amendments to 310 CMR 7.00: Definitions and 310 CMR 7.05: Fuels All Districts. If you have any questions, please contact Paula Hamel at 401-457-9234 or by e-mail at Paula.a.hamel@dom.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Pamela F. Faggert". The signature is written in a cursive, flowing style.

Pamela F. Faggert

Cc:

Kevin Hennessy